

EXHIBIT B

Nicole R. Vanderlaan Smith
(714) 755-8173
nicole.vanderlaan.smith@lw.com

650 Town Center Drive, 20th Floor
Costa Mesa, California 92626-1925
Tel: +1.714.540.1235 Fax: +1.714.755.8290
www.lw.com



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File No. 036309-0044

April 20, 2011

VIA EMAIL AND LNF&S

Tracey L. O'Reilly, Esq.
Miller, Axline & Sawyer
1050 Fulton Avenue, Suite 100
Sacramento, CA 95825-4225

Re: Orange County Water District v. Unocal, Corp., et al.

Dear Ms. O'Reilly:

This letter responds to your letters to Jon Anderson concerning the modeling production stipulation and the extension of certain expert report deadlines and addresses other expert issues in the above-captioned case.

Enclosed are Defendants' proposed revisions to the modeling production stipulation you wrote Jon Anderson about on April 4, 2011. I have tracked the changes we have made to your proposal. Please let us know if you agree to this revised proposal. We are happy to discuss with you any of our suggested changes if you have questions.

With respect to the extension of certain expert report deadlines set forth in your April 12, 2011 letter to Mr. Anderson, as Mr. Anderson indicated in his March 30, 2011 email to you (enclosed for your reference), the extension for defendants' expert reports applies to the expert report of any defense expert who anticipates responding to Anthony Brown, Dr. Graham Fogg, or Dr. Stephen Wheatcraft. As Mr. Anderson previously explained, because it is neither fair, nor practical for Defendants' experts to have to issue multiple reports due to the delay Plaintiff is requesting for some of its experts, if a defense expert is responding to Dr. Wheatcraft, Dr. Fogg, or Mr. Brown they only need submit one responsive report (even if they are responding to other of Plaintiff's experts) and that report is due August 13, 2011 (subject to the complete modeling production agreed upon being provided by Plaintiff's experts by May 30, 2011). We trust that this is your understanding too but wanted to explicitly reiterate this point here to avoid ambiguity down the road.

On Friday, Defendants received expert reports from the following of Plaintiff's experts:

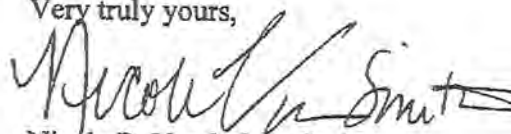
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James Barrington, James Bruya, William Cain, Richard Haberman, Donald Lucas, Marcel Moreau, Robert Reynolds, and Ed Whitelaw. In light of the fact that Plaintiff failed to serve reports from its designated experts David Huntley, Kenneth Kross, Sharon Hennessey, George "Mack" Wesner, and Robert Stollar, we assume these designated experts will not be serving reports or providing expert opinions or testimony in the above-captioned action. Further, in accord with the Court's ruling at the February 15, 2011, hearing, because no expert reports were served on Friday for Roy Herndon, David Bolin, Timothy Sovich, Nira Yamachika, or Michael Wehner, we understand that neither they, nor any other of the non-retained experts Plaintiff listed in its expert designation requiring reports under Rule 26, will be providing expert opinions or testimony in the above-captioned action.

Very truly yours,



Nicole R. Vanderlaan Smith
of LATHAM & WATKINS LLP

Enclosures

cc: All Counsel (via LNF&S)
Jon D. Anderson, Esq.